

**MEMO ENDORSED**

**PERRY, VAN ETTEN,  
ROZANSKI & KUTNER, LLP**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 2/17/2022

**PLEASE REPLY TO:**

**NEW YORK OFFICE**  
14 Wall Street, Suite 4D  
New York, New York 10005  
(212) 406-9710  
Fax (646) 370-3303

Jeffrey K. Van Etten  
Member of the Firm  
[jkvanetten@pvrklaw.com](mailto:jkvanetten@pvrklaw.com)  
Extension 132

**LONG ISLAND OFFICE**  
225 Broadhollow Road, Suite 430  
Melville, New York 11747  
(631) 414-7930  
Fax (631) 777-4504

Members of the Firm  
Douglas P. Perry  
Jeffrey K. Van Etten\*  
Kenneth J. Kutner\*\*

Partners  
Leonard Porcelli\*\*  
Jerome S. Oliner\*  
Geoffrey H. Pforr  
Thomas F. Maher  
Joseph K. Strang  
Kevin J. Brennan

Senior Trial Counsel  
Michael C. Dombrowski

**Via ECF**

The Honorable Valerie E. Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
Courtroom 443  
New York, NY 10007

February 17, 2022

Associates  
John J. Ullrich  
Ariana K. Politis  
Kristen Petersen Hofer  
Anthony Lugara  
Jessica J. Beauvais  
Patrick F. Downey

Of Counsel  
Thaddeus J. Rozanski  
Elizabeth G. Kastner  
Justine L. Grisanti-Van Etten\*  
Amanda L. Perry\*\*\*

Also Admitted in  
New Jersey\*  
Connecticut\*\*  
South Carolina\*\*\*

Re: Gergely Csikos v. S.M. Construction & Contracting Incorporated and  
230 Park South Apartments, Inc.//230 Park South Apartments, Inc. v.  
Remodel Art Corp. and Alin Florin Vadanuta//230 Park South Apartments, Inc.  
v. IR Holdings, LLC, Parkview Developers, LLC and Ian Reisner  
Our File No.: 129010  
**Docket No.: 18-cv-9598 (VEC)**

Dear Honorable Madam:

In following with the Court's Memo Endorsed Order of February 16, 2022 (Document 202), which requests that plaintiff's counsel to respond to defendant's application for leave to serve a late expert witness disclosure by February 23, 2022, the parties have conferred and have agreed to allow defendant an extra week to oppose plaintiff's motion to preclude, so that plaintiff's counsel can address whether they will object to the late disclosure and further, potentially limit or withdraw the pending motion to preclude (Documents 193, 194 and 195).

In consideration therein, defendant also agreed to a one (1) week extension for plaintiff's reply papers. With the Court's approval, defendant's opposition to the motion to preclude will be due on February 25, 2022 and plaintiff's reply papers will be March 4, 2022.

We thank the Court for its attention to this matter and look forward to its granting the request for an extension of time to oppose the pending motion to preclude.

Respectfully submitted,

PERRY, VAN ETEN, ROZANSKI  
& KUTNER, LLP

BY: Jeffrey K. Van Etten  
JEFFREY K. VAN ETEN

JVE/mkr  
Enclosure

cc: Via ECF & E-mail (Hostrovronai@ronaifirm.com)  
Ronai & Ronai, LLP  
The Ronai Building  
34 Adeo Street  
Port Chester, NY 10573  
Attn: Holly Ostrov Ronai, Esq.

Via ECF & E-mail (VAvery@fordharrison.com)  
Ford Harrison, LLP  
60 East 42<sup>nd</sup> Street – 51<sup>st</sup> Floor  
New York, NY 10165  
Attn: Vincent M. Avery, Esq.

Via ECF & E-mail (kdanielsen@kdvlaw.com)  
Kaufman Dolowich Voluck LLP  
25 Main Street, Suite 500  
Hackensack, NJ 07601  
Attn: Kenneth B. Daniels, Esq.

Application DENIED as moot. In its February 9, 2022 Order, *see* Dkt. 200, the Court already granted an extension such that Defendants' opposition to Plaintiff's *Daubert* motion is due by **March 9, 2022**, and Plaintiff's reply is due by **March 16, 2022**.

SO ORDERED.



2/17/2022

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE